

March 11, 1999

DOCKET #98N-1038

Dockets Management Branch (HFA-305)

Food and Drug Administration

5630 Fishers Lane, rm. 1061

Rockville, MD 20852

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To whom it may concern:

I am writing to comment on the possible changes to labeling regulations for food that has been exposed to gamma radiation from radioactive nuclides. Irradiation causes chemical changes in food that can include the generation of carcinogenic compounds, and promotes the industrial use of nuclear waste as acceptable for general society. Neither of these is acceptable to me, and so it is imperative to me that I be able to choose non-irradiated food.

It is also important to me that consumers generally are quickly able to determine if a product has been irradiated or contains irradiated ingredients. With this in mind, I want to make the following points about labeling irradiated food:

All food products that have been irradiated, or which include any ingredients that have been irradiated, should be *prominently* labeled with a declaration of this fact, to include the words 'IRRADIATED PRODUCT' or 'INGREDIENTS EXPOSED TO GAMMA RADIATION' and a logo that clearly indicates that the product has been irradiated. This labeling must be prominently shown on the main panel of the product's labeling.

The existing 'radura' logo is inadequate because it is not an icon that clearly communicates in pictorial form that the product has been exposed to gamma radiation. The logo used must clearly communicate this in pictorial form. The existing logo could still be used so long as an additional icon/logo is added that communicates in pictorial form that the product has been exposed to gamma radiation.

The declaration that the food is irradiated should be more prominent than the ingredient list.

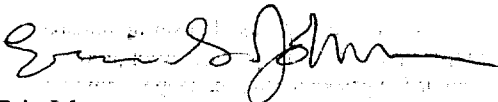
For unpackaged products (e.g. irradiated pineapple from Hawaii), there must be a prominent poster located with the product that very prominently indicates that the product has been irradiated.

Euphemistic wording, such as 'cold pasteurized' or 'electronic pasteurization' (apparently proposed by Senator Harkin of Iowa) are not acceptable alternatives to explicitly using the words 'IRRADIATED PRODUCT' or 'INGREDIENTS EXPOSED TO GAMMA RADIATION,' and must not be allowed.

The declaration that the product has been irradiated or contains ingredients exposed to gamma radiation must be present even if only very small amounts of spices or other minor ingredients are the only parts of the product that have been irradiated.

In short, present regulations are already too weak. I would like to see a significant strengthening, not a weakening, of the regulations regarding labeling of irradiated food products. 'Loosening' the regulations, as is desired by food irradiation interests, is simply not in the best interests of consumer health, environmental safety, or informed consumer choice.

Sincerely,



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